AO 91 (Rev. 11/11) Criminal Complaint (Rev. by USAO on 3/12/20) ☐ Original ☐ Duplicate Original

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# UNITED STATES DISTRICT COURT

for the

Central District of California

	FILED CLERK, U.S. DISTRICT COURT		
	07/08/2025		
CENTRAL DISTRICT OF CALIFORNIA			
]	BY: GR DEPUTY		

United States of America

v.

RANDY PAUL RUIZ and GEORGINA RAVELERO,

Defendant(s)

Case No. 2:25-MJ-04188-DUTY

# CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 8, 2025, in the county of Los Angeles in the Central District of California, the defendant(s) violated:

efendant(s) violated:		
Code Section	Offense Description	
18 U.S.C. § 231(a)(3)	Attempt to Commit Acts to Obstruct, Impede, or Interfere with Law	
This criminal complaint is based on these facts:	Enforcement During Civil Disorder	
Please see attached affidavit.		
☑ Continued on the attached sheet.		
	/s/ George Maloney	
	Complainant's signature	
	George Maloney, Special Agent, FBI	
	Printed name and title	
Attested to by the applicant in accordance with the requir	rements of Fed. R. Crim. P. 4.1 by telephone.	
Date: July 8, 2025	Kanen L. Lewenson	
	Judge's signature	
City and state: Los Angeles, California	Hon. Karen L. Stevenson, U.S. Magistrate Judge	
	Printed name and title	

AUSA: Claire E. Kelly (x3868)

#### **AFFIDAVIT**

I, George Maloney, being duly sworn, declare and state as follows:

#### I. INTRODUCTION

- I am a Special Agent ("SA") with the Federal Bureau of 1. Investigation and have been so employed since January 2016. I am currently assigned to a violent crimes squad in Los Angeles responsible for investigating kidnappings, robberies, extortions, aggravated threats, and assaults on federal officers. From August 2020 to June 2025, I was assigned to a civil rights squad in Los Angeles where I investigated civil rights violations to include deprivation of rights under color of law, hate crimes, and conspiracies. Prior to that, from February 2017 to August 2020, I was assigned to the counterintelligence division of the FBI where I investigated espionage, foreign intelligence activities, malign foreign influence, and provided operational support for the intelligence community. After my graduation from the FBI Academy in June 2016, and until February 2017, I investigated white collar crimes, including wire fraud, healthcare fraud, and public corruption.
- 2. As an FBI Special Agent, I have received training in a variety of investigative and legal matters. I am familiar with and have used various investigative techniques, including search warrants, court-authorized interception of wire, oral, and electronic communications, pen registers/trap and trace orders, telephone toll analysis, physical and electronic surveillance,

confidential sources, cellular telephone analysis, grand jury proceedings, asset forfeiture, and many other investigative tools. Through my training, experience, and interaction with other law enforcement officers, targets, subjects, and witnesses, I am familiar with the motivations of, and methods employed by, individuals who commit violent crimes, wire fraud, extortion, assault, kidnapping, and other criminal violations.

#### II. PURPOSE OF AFFIDAVIT

- 3. This affidavit is in support of a criminal complaint and arrest warrants against RANDY PAUL RUIZ ("RUIZ") and GEORGINA RAVELERO ("RAVELERO") for violations of 18 U.S.C. \$ 231(a)(3) (Attempt to Commit Acts to Obstruct, Impede, or Interfere with Law Enforcement During Civil Disorder) (the "Subject Offense").
- 4. The facts set forth in this affidavit are based upon my participation in this investigation, my personal observations, my training and experience, my review of evidence, including investigative reports, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrants and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only, all amounts or sums are approximate, and all dates and times are on or about those indicated.

#### III. SUMMARY OF PROBABLE CAUSE

- 5. In June 2025, federal law enforcement officials were conducting immigration enforcement operations throughout the Los Angeles area. During and following those operations, protests occurred in and around downtown Los Angeles, California. While many of the protestors peacefully exercised their First Amendment rights to protest, individuals within the crowd directly engaged in violent actions to obstruct, impede, or interfere with law enforcement officer's lawful performance of their official duties incident to and during the commission of a civil disorder, which obstructed, delayed, and adversely obstructed commerce, the movement of articles and commodities in commerce, and conduct and performance of federally protected functions.
- 6. On June 8, 2025, uniformed Los Angeles Police
  Department officers responded to civil unrest in downtown Los
  Angeles and attempted to provide crowd control near a United
  States Bureau of Prisons facility by creating what is referred
  to as a "skirmish line." Within approximately thirty-five
  seconds of each other, two people (later identified as RUIZ and
  RAVELERO) intentionally drove their motorcycles into the line of
  LAPD officers who made up the skirmish line, in an effort to
  obstruct, impede, or interfere with the lawful performance of
  their duties.

#### IV. STATEMENT OF PROBABLE CAUSE

- A. June 2025 Protests in Downtown Los Angeles, Including Near Federal Buildings, Cause Building and Business Closures
- 7. Based on my review of law enforcement reports, discussions with other investigators, my review of body-worn camera ("BWC") footage, social media videos, and news reports, and my own involvement in the investigation, I am aware of the following:
- On June 6, 2025, federal law enforcement officials from Immigrations and Customs Enforcement ("ICE") and Homeland Security Investigations ("HSI") conducted immigration enforcement actions supported by the Drug Enforcement Administration ("DEA"), the United States Marshals Service ("USMS"), the Federal Bureau of Investigation ("FBI") and other federal law enforcement agencies in and around Los Angeles, California. Following this enforcement activity, protests sprung up in various locations in and around the city of Los Angeles. Many of these protests were in the vicinity of federal government facilities in downtown Los Angeles, including the Federal Building ("Federal Building") located at 300 North Los Angeles Street, and the Metropolitan Detention Center ("MDC") which is a United States Bureau of Prisons facility located at 535 North Alameda Street, near the intersection of East Aliso Street and North Alameda Street. Both locations are United States government buildings within the Central District of California.

- 9. While many of the protests were peaceful, agitators within the crowd engaged in violent activity -- constituting a civil disorder -- directed at private property, government buildings, and both federal and local law enforcement officers. Multiple officers and agents from the Los Angeles Police Department ("LAPD"), Los Angeles Sheriff's Department ("LASD"), USMS, and the FBI were assaulted, at times requiring medical attention. Multiple federal buildings were also vandalized with graffiti and law enforcement vehicles were damaged by blunt objects swung by violent protestors.
- 10. The protests impacted critical functions of operations of the United States government, including by restricting access to, and causing the lock-down of, federal buildings and buildings containing federal employee offices. Specifically, MDC was subjected to lock-downs and visiting hours came to a halt at times during the protests. The presence of protesters in the area, including violent protesters, caused the closure of some downtown Los Angeles businesses and the suspension of some rideshare services in the area, thereby affecting commerce or the movement of any article or commodity in commerce from these businesses. The civil disorder also led to the closure of sections of U.S. Route 101 in downtown Los Angeles. I am aware that U.S. Route 101 is a major highway that runs from Southern California through Oregon and into Washington State.

# B. RUIZ and RAVELERO Drive Motorcycles into a Line of LAPD Officers Conducting Crowd Control

- 11. I learned the following information from reviewing LAPD reports and witness statements, BWC footage, social media videos, and news reports, as well as from speaking with LAPD Detective Mariana Patin.
- 12. According to LAPD reports and statements provided by LAPD officers, in the afternoon of June 8, 2025, uniformed LAPD officers were responding to civil unrest in downtown Los Angeles and providing crowd control. Specifically, officers were responding to a large protest near the Roybal Federal Building and MDC near the intersection of Temple Street and Alameda Street. Officers were attempting to prevent a large crowd that had gathered in front of MDC from returning northbound. Officers lined up (in what is known as a skirmish line) facing South on Temple Street, just North of Alameda Street.



- 13. According to a statement by LAPD Officer Muro, by this time, LAPD personnel had verbally advised the crowd that the incident and the area had been declared an unlawful assembly.
- 14. According to statements by several LAPD Officers who were in or near the skirmish line, officers heard the revving of motorcycles from behind the crowd of protestors. Officers then saw a man (later identified as RUIZ) drive a motorcycle through the line of officers. LAPD then took RUIZ into custody and identified him. Approximately thirty-five seconds later, a woman (later identified as RAVELERO) drove a motorcycle into the skirmish line. LAPD took RAVELERO into custody.
- 15. I have viewed several videos capturing these events, including BWC footage and video captured by bystanders and posted to social media accounts. The videos depict the following, among other conduct:
- a. There are several dozen uniformed law enforcement officers gathered along the crosswalk in a skirmish line, blocking the street northbound on Alameda Street at the intersection with Temple Street. The officers are facing a crowd of protestors, some of whom are throwing items at the officers. What appear to be police vehicles are parked behind the skirmish line, further blocking the street. Visible in the background just behind the officers is a building containing the Los Angeles Veterans Affairs Clinic at 351 East Temple Street.
- b. A person wearing a Guatemalan flag around their shoulders and a motorcycle helmet (later detained and identified as RUIZ) drives a motorcycle at and through the skirmish line,

as officers move out of the way. One officer is able to pull RUIZ from his motorcycle and others detain him, while officers attempt to regroup and re-form the skirmish line. At the beginning of a video depicting RUIZ driving towards the police, RAVELERO is visible on her motorcycle behind RUIZ.

- c. About twenty seconds later, there is a sound of a vehicle horn honking from the crowd, and RAVELERO emerges from the crowd of protestors, driving a motorcycle. She drives the motorcycle through the skirmish line, running directly into one officer who braces for the impact. RAVELERO is knocked off the motorcycle by the same officer and is detained by officers located behind the skirmish line.
- d. In another video, RAVELERO is seen revving her motorcycle before driving into the skirmish line.
- e. As the officers regroup, an officer is heard calling out to protestors to clear the area because it is an unlawful assembly.
- 16. I have reviewed video footage of RAVELERO being asked questions by a person off-camera who appears to be a journalist or bystander. RAVELERO is asked why she was arrested, and she responds, "Because my bike went onto a policeman," and then smiles. RAVELERO is then asked why she is here today, and she explains her reasons for protesting. At the end of the video, RAVELERO says "I'm getting a felony guys, I guess."

17. Still-frame images from some of the videos are below, with RUIZ and RAVELERO circled in red in one of the images:





### Sergeant Lankford BWC:



## Officer Trujillo BWC:







#### C. Arrest of RUIZ and RAVELERO

18. According to LAPD reports, LAPD arrested RUIZ and RAVELERO for violations of California Penal Code Section 245(c) (assault with a deadly weapon or instrument other than a firearm, or by any means likely to produce great bodily injury upon the person of a peace officer or firefighter). On June 10,

2025, RUIZ and RAVELERO were charged in state court via felony complaint with two counts of violating Section 245(c).

#### V. CONCLUSION

19. During a civil disorder, RUIZ and RAVELERO drove motorcycles into law enforcement officers who were attempting to block off a street and conduct crowd control. The civil disorder affected commerce and the movement of articles and commodities in commerce by restricting access to, and causing the closures of, businesses in the downtown Los Angeles areas, and causing the closure of portions of U.S. Route 101, an interstate highway. Additionally, the ongoing protests caused lock-downs and disrupted service to buildings in downtown Los Angeles, including federal buildings such as MDC, where federal offices are located, thus obstructing, delaying, or adversely affecting the conduct or performance of any federally protected function.

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20. For the reasons described above, there is probable cause to believe that RUIZ and RAVELERO committed criminal violations of the Subject Offense.

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone on this 8th day of July, 2025.

HONORABLE KAREN L. STEVENSON

UNITED STATES MAGISTRATE JUDGE